

# **Carolyn Smith, et al. v. Jefferson County, Mississippi, et al.**

**Sandra Sanders**

**April 18, 2025**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
WESTERN DIVISION

CAROLYN SMITH, ET AL

PLAINTIFFS

V. CIVIL ACTION NO. 5:24-CV-0072-DCB-ASH

JEFFERSON COUNTY,  
MISSISSIPPI, ET AL

DEFENDANTS

DEPOSITION OF SANDRA SANDERS

Taken at the instance of the Defendants at the Law  
Offices of Carroll Rhodes, 119 Downing Street,  
Hazlehurst, Mississippi 39083, on Friday,  
April 18, 2025,  
beginning at 1:11 p.m.

REPORTED BY:

ROBIN G. BURWELL, CCR #1651

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<p>1 APPEARANCES:</p> <p>2</p> <p>3 CARROLL RHODES, ESQ.</p> <p>4 Law Offices of Carroll Rhodes</p> <p>5 Post Office Box 588</p> <p>6 Hazlehurst, Mississippi 39083</p> <p>7 crhode@bellsouth.net</p> <p>8</p> <p>9 COUNSEL FOR PLAINTIFF</p> <p>10</p> <p>11 THOMAS L. CARPENTER, ESQ.</p> <p>12 Wise, Carter, Child &amp; Caraway</p> <p>13 2510 14th Street, Suite 1125</p> <p>14 Gulfport, Mississippi 39501</p> <p>15 tlc@wisecarter.com</p> <p>16</p> <p>17 COUNSEL FOR DEFENDANT</p> <p>18</p> <p>19 ALSO PRESENT:</p> <p>20 Carolyn Smith</p> <p>21 Shaquita McComb</p> <p>22 James Ellis, Jr.</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 SANDRA SANDERS,</p> <p>2 having been first duly sworn, was examined and</p> <p>3 testified as follows:</p> <p>4 EXAMINATION BY MR. CARPENTER:</p> <p>5 Q. Ms. Sanders, I'm Tom Carpenter. Of</p> <p>6 course, by now you know me.</p> <p>7 A. Yeah.</p> <p>8 MR. CARPENTER: And we can do the usual</p> <p>9 stipulations?</p> <p>10 MR. RHODES: Yeah.</p> <p>11 MR. CARPENTER: And read and sign?</p> <p>12 MR. RHODES: Yeah.</p> <p>13 Q. (By Mr. Carpenter) What's your first</p> <p>14 name? We can already get started.</p> <p>15 A. Sandra Sanders.</p> <p>16 Q. Yes, ma'am.</p> <p>17 And what is your address?</p> <p>18 A. PO Box -- you want the mailing or the</p> <p>19 physical?</p> <p>20 Q. Physical address.</p> <p>21 A. 18030 Highway 61.</p> <p>22 Q. That's in?</p> <p>23 A. Fayette 39069.</p> <p>24 Q. Okay. And where are you currently</p> <p>25 employed today?</p>
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<p>1 A. Just was working that one.</p> <p>2 Q. Okay. And I've got your educational</p> <p>3 background. You have a master's degree?</p> <p>4 A. Uh-huh. (Affirmative response.)</p> <p>5 Q. What is your --</p> <p>6 MR. RHODES: You have to yes.</p> <p>7 THE WITNESS: Yes, sir. I'm sorry.</p> <p>8 Q. (By Mr. Carpenter) That's okay.</p> <p>9 A. You know, we're full now.</p> <p>10 Q. That's right. So your bachelor's degree</p> <p>11 is Alcorn?</p> <p>12 A. Uh-huh. (Affirmative response.)</p> <p>13 Q. And what is that?</p> <p>14 A. My bachelor's -- yes, sir. My</p> <p>15 bachelor's degree is in criminal justice.</p> <p>16 Q. And what is your master's in?</p> <p>17 A. Workforce leadership.</p> <p>18 Q. And there was something about a MAT?</p> <p>19 A. MAT, that's for teachers license. I got</p> <p>20 that at Belhaven.</p> <p>21 Q. That's what I was thinking.</p> <p>22 And is that -- is your licensure for</p> <p>23 secondary education, like high school or is it --</p> <p>24 A. It was from 7 to 12th.</p> <p>25 Q. And when -- of course, you were working.</p>	<p>1 that too. It is not science fiction anymore that</p> <p>2 I might get Social Security.</p> <p>3 A. That's right.</p> <p>4 Q. All righty. And then we'll talk about</p> <p>5 medicals. And so as far as the results of what</p> <p>6 happened at The Facility, you're able to do the</p> <p>7 work that you're doing in the School District,</p> <p>8 though, without any difficulty?</p> <p>9 A. I can do it. It's not stressful. I</p> <p>10 mean, it can be, but...</p> <p>11 Q. Going to the complaint. What we have is</p> <p>12 that you started work with The Facility in 2016?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And were there until the end of '23?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Okay. And you mention in paragraph 78</p> <p>17 that you support Shawn Jones, and you allowed him</p> <p>18 to place a campaign sign for sheriff in your yard?</p> <p>19 A. Well, I put the sign -- allowed him to</p> <p>20 put the sign in the yard. It didn't state whether</p> <p>21 or not -- who I voted for.</p> <p>22 Q. Exactly.</p> <p>23 A. It's just that I gave him permission to</p> <p>24 put his sign in my yard. I mean, even though I</p> <p>25 voted for him, but that not...</p>
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<p>1 And I know you had two jobs. Did you just decide</p> <p>2 not to keep doing two jobs because it was</p> <p>3 stressful or --</p> <p>4 A. Well, I was depressed behind, you know,</p> <p>5 losing the job there, and then -- so, you know --</p> <p>6 because that was after Christmas and this and</p> <p>7 that. And then so as I was getting to the age of</p> <p>8 retiring, I looked into that. So I said that if I</p> <p>9 do that, then that probably will make up for what</p> <p>10 I lost at the prison.</p> <p>11 Q. I understand. Absolutely.</p> <p>12 A. So I talked to them, and sure enough</p> <p>13 that could balance out from what I lost at the</p> <p>14 prison.</p> <p>15 Q. Okay. All righty.</p> <p>16 A. I mean, it wasn't as much but it still</p> <p>17 balanced out where it wouldn't be -- you know, I</p> <p>18 still needed two incomes.</p> <p>19 Q. Right. Exactly.</p> <p>20 And as I was saying to everybody else,</p> <p>21 since this isn't going out on public perspective,</p> <p>22 how old are you now?</p> <p>23 A. 63.</p> <p>24 Q. Well, I'm 60, so I'm getting there. And</p> <p>25 so when you said income replacement, I'm thinking</p>	<p>1 Q. Now, because one of the things is the</p> <p>2 support you gave for Shawn. And of course, you</p> <p>3 allowed him to have a sign. But the sheriff</p> <p>4 didn't know who you were voting for?</p> <p>5 A. Right.</p> <p>6 Q. And so other than just having the sign</p> <p>7 in the yard, did you do anything else?</p> <p>8 A. No.</p> <p>9 Q. Fair enough. And so then in paragraph</p> <p>10 79 it says Sheriff Bailey sent Major Felton to you</p> <p>11 to complain about Shawn James{sic}?</p> <p>12 A. I don't know if he sent. He just made</p> <p>13 the statement at the job. We was on the outside</p> <p>14 in front of the prison. He stated that the</p> <p>15 Sheriff wasn't pleased with me because I had Shawn</p> <p>16 Jones' sign in my yard. And I told the Major, I</p> <p>17 say he could put his sign in my yard because a</p> <p>18 sign don't vote.</p> <p>19 Q. Right. I've heard so many campaign</p> <p>20 managers say that in the last four months, signs</p> <p>21 don't vote. So I do see what you mean.</p> <p>22 A. And he could have.</p> <p>23 Q. Right.</p> <p>24 Did Sheriff Bailey say anything directly</p> <p>25 about the sign?</p>

3 (Pages 6 to 9)

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1 A. No, but I approached him.  
 2 Q. That's where we're going. Because it  
 3 says in paragraph 81, "Sheriff Bailey subsequently  
 4 told Sandra Sanders that he needed her vote but  
 5 she let him know he supported Shawn for sheriff."  
 6 Is that what you were referring to?  
 7 A. Well, pretty much. When I -- when Major  
 8 told me about the sign, when I saw him again we  
 9 was, again, outside. And I stated to him, I said  
 10 that you said that you had a problem with me, you  
 11 know, having Shawn's sign. I said you could have  
 12 put a sign in my yard. And then he was like -- I  
 13 said because a sign don't vote. And he is my  
 14 classmate. And he said, classmates, you are  
 15 right. So I left it at that.  
 16 But, you know, after that he stopped  
 17 speaking and stuff like that. Now, I heard rumors  
 18 of other things but I never knowed that, you know,  
 19 I was involved in it. Because the rumors was --  
 20 and most of the time, as they call it, the street  
 21 committee, know more about what's going on than  
 22 the peoples that's actually working in The  
 23 Facility.  
 24 Q. That's right.  
 25 A. And normally you can -- you know, they

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1 envelope, they can probably say that person. But  
 2 others that's going to that machine, they cannot  
 3 determine or say. You don't have no proof who I  
 4 voted for.  
 5 Q. So essentially when you went back and  
 6 you talked to -- you say you talked to the Sheriff  
 7 or you talked to Major Felton?  
 8 A. I talked to the -- I went to him and  
 9 told him that he could have put a sign in my yard.  
 10 Q. And that "him" is the Sheriff?  
 11 A. The Sheriff. I told Sheriff Bailey that  
 12 he could put a sign in my yard because -- and he  
 13 was like -- all he said was you right, classmate.  
 14 Q. And was there anything else said by the  
 15 Sheriff about the election, other than your  
 16 recollection of that?  
 17 A. No more than when they had the mandatory  
 18 meeting.  
 19 Q. And do you know when the mandatory  
 20 meeting was?  
 21 A. Huh-huh. (Negative response.)  
 22 Q. Sometime in '23?  
 23 MR. RHODES: No.  
 24 THE WITNESS: No -- I mean, yes, no.  
 25 No.

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1 say don't listen to hearsay, but sometime it  
 2 basically be true. So on this hand it was.  
 3 Q. And what were you hearing from  
 4 background from folks?  
 5 A. It was just among the ones that was  
 6 working in The Facility and that he wasn't going  
 7 to rehire certain people. You know, whether it  
 8 was because their family was running for something  
 9 or whatever and they was saying that he said that  
 10 he know who voted for him and who didn't. So by  
 11 me working on the election poll for election, I'm  
 12 like how is it possible that he know what each  
 13 individual and who voted for who. I can't see --  
 14 I've never knowed that, and I've worked on the  
 15 election poll for years and I never knowed that  
 16 you'll be able to tell me oh, Sandra you didn't  
 17 vote for me because I see it on this doc -- you  
 18 see what I'm saying?  
 19 Q. Yeah, and you can't. You're absolutely  
 20 right.  
 21 A. So you can't. So I said if he told you  
 22 that, then he's lying. He do not know each  
 23 individual, unless they take those, what it is,  
 24 the ones -- the absentee votes. Now, if they look  
 25 at those peoples and then they look at who on that

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1 Q. (By Mr. Carpenter) And of course  
 2 Ms. McComb stated who was in that particular  
 3 meeting, the mandatory meeting.  
 4 A. It's the same.  
 5 Q. Was that the list --  
 6 A. Uh-huh. (Affirmative response.) The  
 7 same peoples, and more.  
 8 Q. And what do you recall about what was  
 9 said?  
 10 A. Oh, I could remember it pretty -- he was  
 11 saying that we needed to have his back and that --  
 12 he said that we needed to support him in his  
 13 election coming up. We needed to have his back.  
 14 He told us that he was trying to get a certain  
 15 amount of money for each individual inmate. And  
 16 he just went on and on.  
 17 But I know because I responded to his  
 18 remarks because I told him, "You want us to  
 19 support you now and the last four years you  
 20 haven't supported us or had our back. So why  
 21 should we have your back?" I said, "You told us  
 22 that you was going to give us a raise." I said,  
 23 "In these last fours you haven't gave us a raise."  
 24 I said, "Not a nickel, a penny, a quarter,  
 25 nothing." I said, "You haven't gave us anything."

4 (Pages 10 to 13)

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1 But here you're saying now."  
 2 So he kind of got, like, mad at me  
 3 because I was telling him that. Like I told him,  
 4 you said, "You was going to give us a raise. You  
 5 didn't say how you was going to give us a raise,  
 6 what was it going to take to get the raise. I'm  
 7 going by what you're saying. Now you're standing  
 8 here again, another four years, wanting us to vote  
 9 for you when you haven't did nothing for us in the  
 10 last four years." That's what I told him.  
 11 Q. And what was his response?  
 12 A. Got red. And A lot of peoples after the  
 13 meeting say, "You know you made him mad." I mean,  
 14 closed mouths don't get fed.  
 15 Q. Right.  
 16 A. I just was going by what he told us.  
 17 But here you coming again wanting us to support  
 18 you, but you haven't did anything for the -- you  
 19 know, the prison. You talked about -- he also  
 20 talked about -- well, that's another story.  
 21 That's with the interview.  
 22 Q. Okay. And we're going to probably get  
 23 to that next. But between that discussion at the  
 24 mandatory meeting, was the next time he talked to  
 25 you about -- at the pre-interview or did he say

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1 where you see yourself in five years, what is your  
 2 weakness, what is your strength. You know what  
 3 I'm saying? I done did interviews enough to know  
 4 none of those questions was asked in this  
 5 so-called interview.  
 6 Q. So it was essentially him telling you  
 7 everything and not asking anything from you?  
 8 A. Not asking anything.  
 9 Q. All right. In that discussion coming to  
 10 you, did he mention -- you had mentioned something  
 11 about he had gotten rid of some. Did he say why  
 12 he got rid of them?  
 13 A. No. They had resigned. I think it was  
 14 like the Major -- not the Major. The Warden had  
 15 left, Nurse Lee, Deputy Warden and the Captain.  
 16 Q. Gotcha.  
 17 A. And it's somebody else I can't think of.  
 18 But the ones that had already resigned, they name  
 19 was -- the street committee had they names, that  
 20 they would be with us, terminated. But by them  
 21 having years already in, they didn't, you know --  
 22 they went on and resigned.  
 23 Q. Okay.  
 24 A. I guess you would call it resigned, or  
 25 retired or something. But they had heard that

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1 anything about the election between those two  
 2 times?  
 3 A. Not until the interview, which wasn't no  
 4 interview.  
 5 Q. Tell me about that. Who was there?  
 6 A. Nobody but him, which I had never seen  
 7 before.  
 8 Q. Okay. And what happened?  
 9 A. He told me to come in, sit down, this  
 10 was a mandatory meeting. And then he started  
 11 talking about he had already rid of some peoples  
 12 and the people that had resigned or quit, they was  
 13 for Sheriff Walker. He stated that -- he talked  
 14 about some guy I didn't even know who he was. He  
 15 was on the police department, I want to say. I  
 16 can't remember. Because the police and the  
 17 Sheriff departments, they worked together. So I  
 18 don't know who the guy was. He was talking about  
 19 he was stealing time. He found out that he  
 20 wasn't -- he was supposed to be at work and he was  
 21 at home but he wants peoples that's going to  
 22 support him in his election. And he just went on  
 23 and on and on. It was at a point that I pretty  
 24 much, to be honest, I blocked him out. Because  
 25 the interviewer going to ask you what's your name,

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1 they name was in there as well. But they had the  
 2 years and the -- some of them had the years and  
 3 the age and some of them just had the years for --  
 4 as retirement or whatever.  
 5 Q. I follow you. Absolutely.  
 6 And so after the interview, did you ever  
 7 talk with the Sheriff again?  
 8 A. No more than -- no, I didn't even talk  
 9 to him after I got my papers. Because they let me  
 10 come to work that night.  
 11 Q. Right. And what happened in terms of --  
 12 did you file a grievance?  
 13 A. Yeah, but we caught the devil.  
 14 Q. You said you copied?  
 15 A. Caught the devil.  
 16 Q. Okay. What happened?  
 17 A. Well, when we got the paper -- he gave  
 18 us the paperwork. So when I got fired -- like I'm  
 19 saying, it's after the holidays.  
 20 Q. Right.  
 21 A. Everybody broke and, you know -- what  
 22 they say; it takes six months to pay the bills  
 23 after Christmas, or whatever the saying go.  
 24 Q. That's right.  
 25 A. So when they gave me the papers I was at

5 (Pages 14 to 17)

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1 home. By right, like I say, they do what they  
2 want to do. I wasn't even really supposed to --  
3 they wasn't even supposed to allow me on the  
4 premises at the prison. But they allowed me to  
5 work but I only came there because in my mind I'm  
6 already, you know, thinking about, okay, I've got  
7 to see if all of this is right; is what they doing  
8 to us right. In my mind I was looking. I went  
9 there to look for the handbook. That's my whole  
10 12 hours. I was looking for the handbook to make  
11 sure that what they was doing was legal.

12 But then after that they was like, "If  
13 he fired you, why did you go to work?" I said, "I  
14 had a purpose." So after that, some kept on  
15 telling me, "You got a handbook; you have a  
16 handbook."

17 But anyway, far as the grievance go,  
18 they was telling us you got to go this place.  
19 They was having us running this place, running  
20 that place. So somebody told us to go with  
21 Lieutenant, which is Carolyn. She had somebody  
22 telling her what to do. So she was helping the  
23 rest of us. So we made up our own grievance. And  
24 by the time -- time was running down with the  
25 grievance because we had a certain amount of time

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1 following it. And now I'm just going through some  
2 interrogatories to make sure that I've got  
3 everything.

4 During the -- in medicals, because I  
5 know I asked this of Ms. Blake, and that's where I  
6 was -- but I was focusing more, I guess -- do you  
7 recall any instances where you were having any  
8 medical problems?

9 A. When they did some tear gas and I had  
10 to --

11 Q. Sure.

12 A. And they didn't know what was going on.

13 Q. What happened?

14 A. I didn't know they had did no mace, or  
15 whatever they did. And they had put it in there.  
16 And by me being in a confined room, I didn't think  
17 that it would have came up in there where I was.  
18 And I just started gasping and coughing and  
19 whatever, whatever. And I think I -- I want to  
20 say I passed out.

21 Q. Gotcha. When was this, if you recall?

22 A. I can't tell you no dates.

23 Q. Was it -- and I know not particular.

24 But was it in '22, '23 maybe, if you know?

25 A. I can't say.

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1 to give it in. I mean to, you know, pursue it.

2 So by that time, when we got all our  
3 grievance did, we did it on paper. Here you come  
4 maybe some months later, which it wouldn't have  
5 been no good, you sending us a certified grievance  
6 letter. When I found the handbook, the handbook  
7 fully states right there in the handbook there go  
8 a grievance and who you're supposed to contact in  
9 the handbook.

10 Q. Right.

11 A. But why would you give us the run-around  
12 when it's in the handbook what we're supposed to  
13 do. But nobody could tell us nothing. Everybody  
14 we went to -- we went to the Sheriff; we went to  
15 Major Felton, because he was the one acting as  
16 warden then.

17 Nobody told us what to do, so that's why  
18 we had to do a handwritten grievance. We even  
19 went to the, what, board of supervisors.

20 Q. What happened with that?

21 A. Nothing. They was like sorry that that  
22 happened to us. But your name on our checks.  
23 Board of supervisors is on our checks but they  
24 couldn't help us.

25 Q. And from that period -- okay. I'm

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1 Q. Did the ambulance come out?

2 A. They did.

3 Q. And what did they do?

4 A. They just wanted to check me to make  
5 sure that I was okay and they told me that I could  
6 refuse to not go with them, which I did because  
7 that would have just been an extra bill. You  
8 know, once they was saying that I was okay or  
9 whatever, nothing major that I had to go to the  
10 emergency room for. And then it was just -- I  
11 found out that it was in the tear gas.

12 Q. Got it. Okay.

13 Other than that one instant with tear  
14 gas, has there been any other incidence when you  
15 had a medical emergency with work?

16 A. Been so long ago. I mean, I've been off  
17 with an inmate and something happened to me.

18 Q. Okay. What was that?

19 A. We was at the emergency room with an  
20 inmate and I wind up in ICU.

21 Q. And what happened?

22 A. I coded twice and they said I had had a  
23 heart attack.

24 Q. Okay. Do you know about how many years  
25 ago that was?

6 (Pages 18 to 21)



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<p>1 A. It should have been like -- like '18 or 2 '19. 2018, 2019.</p> <p>3 Q. Okay. Other than -- and of course, this 4 is what we call a grab bag question so we make 5 sure we got the question asked. Other than what 6 we've discussed, were there other conversations 7 you had with Sheriff Bailey? Have we missed any 8 conversations?</p> <p>9 A. Huh-huh. (Negative response.) No, 10 because he try to stay out your way.</p> <p>11 Q. All right. Do you know how many times 12 you visited a doctor because of anxiety and 13 depression from this particular incident with The 14 Facility?</p> <p>15 A. Maybe twice, because I seen Dr. Omolara. 16 I told him about it, which I see him anyway. But 17 it was just to the point that before I got my 18 second -- before I started getting my money from 19 my Social Security, it was only one income and 20 that was kind of like stressing you out, because 21 all of a sudden you only have one income and you 22 got the stress, paying all of your bills and 23 household goods and stuff like that. So that was 24 kind of stressful. But at the same time, I still 25 had family members helping me to, you know, pay</p>	<p>1 Now, this one was from August 29th of 2 2022, and it indicates that, according to Nurse 3 Bounds, you had anxiety and depression in past 4 medical history; is that correct?</p> <p>5 A. Yes, sir.</p> <p>6 Q. And that you had had -- you'd had -- I 7 know I'm going to get it out right. This would 8 have been in '22, so you would have had your heart 9 attack in 2018 or '19?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And who was -- how were you being 12 treated for that in terms of preventing another 13 one?</p> <p>14 A. Talking about now or whatever? I have 15 the pacemaker defibrillator. Which I've had some 16 episodes, but I have a ICD.</p> <p>17 Q. And when did you have that installed or 18 implanted?</p> <p>19 A. During that time. Along the time 20 that -- before I left the hospital.</p> <p>21 Q. So by August '22 you had it in planted?</p> <p>22 A. Yes, sir.</p> <p>23 Q. They indicate -- this is Nurse Bounds 24 saying, "Complex Regional Pain Syndrome." And 25 that's a medical term that we would know for</p>
Page 23	Page 25
<p>1 certain stuff.</p> <p>2 Q. Exactly. Okay.</p> <p>3 Had you ever been -- I mean, other 4 than -- with the heart attack, you were on the 5 job. I mean, you were at the hospital escorting a 6 patient?</p> <p>7 A. Uh-huh. (Affirmative response.) But 8 that was just -- uh-huh. (Affirmative response.)</p> <p>9 Q. Absolutely. Have you ever been 10 physically injured in the last five years, like 11 truck accidents or -- like Ms. McComb with her 12 logging accident?</p> <p>13 A. No, sir.</p> <p>14 Q. Okay. I've got some medical records. 15 As you can tell, there ain't a lot of them so this 16 won't take long. But I wanted to -- there's one, 17 and these are documented. This is from Bounds 18 Family Medicine. You recall seeing Nurse Bounds 19 there?</p> <p>20 A. Uh-huh. (Affirmative response.)</p> <p>21 Q. Okay. And we'll take that for a yes.</p> <p>22 A. Yes. I'm sorry. I'm so sorry, yes.</p> <p>23 Yes.</p> <p>24 Q. That's all right. You're doing just 25 fine.</p>	<p>1 personal injury. It's pain in the left upper 2 extremity, so that would be up in this area?</p> <p>3 A. Right here (indicating)?</p> <p>4 Q. Yes, ma'am. Without them saying what 5 exactly it is.</p> <p>6 A. Yes, sir.</p> <p>7 Q. Do you recall having issues with that?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And it looks like they were giving you 10 Naproxen for that?</p> <p>11 A. Yes, sir.</p> <p>12 Q. And I note with the anxiety and 13 depression and insomnia -- how long ago did that 14 start from 2022? Because I'll show you what we're 15 looking at. And I guess my question would be: 16 Can you say when these conditions started, that 17 you started experiencing issues with them?</p> <p>18 A. After I had my episode with the -- 19 getting used to the device being in me. That was 20 life changing.</p> <p>21 Q. Sure.</p> <p>22 A. Yeah, during that time.</p> <p>23 Q. And then skipping ahead to October of 24 '23. So we're still before -- you're still 25 working at The Facility. And in this case you had</p>

7 (Pages 22 to 25)



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1 come and they were saying that you were having  
 2 acute intractable headache. Do you recall having  
 3 anything like migraines or anything?  
 4 A. Uh-huh. (Affirmative response.) I have  
 5 migraines. Yeah.  
 6 Q. And they had given you medication for  
 7 that?  
 8 A. Yep, and they didn't -- they upped the  
 9 dosage on that.  
 10 Q. Right.  
 11 A. Stress.  
 12 Q. Exactly. So you were having stress as  
 13 well at that period of time?  
 14 A. Uh-huh. (Affirmative response.)  
 15 Q. Yes, ma'am.  
 16 A. Yes, sir.  
 17 Q. Everybody's telling you to say yes.  
 18 THE WITNESS: I'm like you, Mr. Rhodes;  
 19 I'm getting sleepy.  
 20 Q. (By Mr. Carpenter) And this one is the  
 21 last one -- medical record while you were working  
 22 at The Facility. And this one is essentially on  
 23 12/11 of '23. And it's indicating that you were  
 24 having issues with edema, or swelling of a leg?  
 25 A. Oh, yeah. That would be the fluid.

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1 Q. Did you let Nurse Bounds know that hey  
 2 --  
 3 A. Yes, sir. I let him know because he --  
 4 I don't know what the name of the medicine was,  
 5 because I told him that it still was at the point  
 6 where I wasn't being able to sleep. But I done  
 7 forgot the name of the medicine. He added to it,  
 8 but I didn't -- I took it but I didn't take it  
 9 long. I just -- I don't know what happened. I  
 10 took it -- it didn't seem like it was working and  
 11 that was the only thing that he was going to give  
 12 me because I already had other medication.  
 13 Q. Right.  
 14 A. And then sometime I don't be wanting to  
 15 take all of that medicine because at the same  
 16 time, I don't want to get addicted to it.  
 17 Q. Right. I understand. Absolutely.  
 18 And so it looked like for this visit in  
 19 February you were there for COVID-19, which was  
 20 still an issue?  
 21 A. Uh-huh. (Affirmative response.)  
 22 Q. And for someone like you, with heart  
 23 issues, COVID's a lot more than just an average  
 24 flu anymore?  
 25 A. Yeah, underlying health.

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1 Q. Okay. Is that related to your  
 2 hypertension and heart issues?  
 3 A. Yes, sir.  
 4 Q. And at that time they also indicated  
 5 that you were being treated with medication for  
 6 depression, unspecified. Do you recall?  
 7 A. Where are we looking?  
 8 Q. Right here?  
 9 A. Yes, sir.  
 10 Q. And what was causing depression in  
 11 December of '23, before you were let go?  
 12 A. The same thing.  
 13 Q. Okay. And that's your heart condition,  
 14 essentially?  
 15 A. Well, you've got to get use to this pace  
 16 -- you know, when you're taking a bath and you're  
 17 rubbing on something.  
 18 Q. Oh, yeah, absolutely. My dad had one so  
 19 I know what you're saying.  
 20 This note is from February of '24. So  
 21 this would be a couple of months after you had  
 22 left The Facility. At that time, were you -- you  
 23 had been previously diagnosed with depression, but  
 24 was it getting worse?  
 25 A. Yes, sir.

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1 Q. Absolutely.  
 2 And then this one is a whole year later.  
 3 And it might be the last one. I'll check. One  
 4 more.  
 5 So in this case, it looks like that you  
 6 were taking Alprazolam for anxiety in February of  
 7 '25. Because I'll show you these medical. And I  
 8 was going to ask you -- this would have been a  
 9 year and two months after working for The  
 10 Facility.  
 11 Were you having additional anxiety at  
 12 the time or was this the doctor saying I'm  
 13 noticing this and you should take Alprazolam?  
 14 A. They noticed in the -- what I was going  
 15 through, and I'm still adjusting like anybody else  
 16 with the adjustments with the job and stuff. Like  
 17 I say, I'm still not -- the money I was making at  
 18 the prison compared to what I was making at the  
 19 school is still not -- but it's better than  
 20 nothing. So I still have to worry -- I got bills.  
 21 It's just me. It's nobody but me. So my income  
 22 is my income. I don't have -- and I don't like to  
 23 ask anybody for anything else.  
 24 Q. Sure.  
 25 A. So it gets hectic.

8 (Pages 26 to 29)

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<p>1 Q. I understand.</p> <p>2 A. And then I still be really bothered with</p> <p>3 the -- just the other day I say I'm going to have</p> <p>4 to ask can I go back and ask him -- because the</p> <p>5 medication that they had me taking for my</p> <p>6 migraines, they wanted me to up the dosage. But</p> <p>7 that's like 400 milligrams, but it's still not --</p> <p>8 I don't know if it's something triggering it. I</p> <p>9 mean, I know it's the stress or whatever but the</p> <p>10 medication that they had me to up the dose on,</p> <p>11 they need to change it to something else.</p> <p>12 Q. I'm following you.</p> <p>13 A. Because if I didn't have the headaches,</p> <p>14 I don't know -- I'd be all right.</p> <p>15 Q. I understand.</p> <p>16 And this one is essentially -- it looks</p> <p>17 like the last visit's March 4th of '25. Do you</p> <p>18 know if you've been do a doctor since then or a</p> <p>19 nurse?</p> <p>20 A. I have but it wasn't for -- it was just</p> <p>21 to get my Vitamin D and my B-12 shots.</p> <p>22 Q. Gotcha. And this one just looks like --</p> <p>23 you were saying that this was a routine check-up,</p> <p>24 but you were still having pain in your chest</p> <p>25 because of the defibrillator implant?</p>	<p>1 Q. Yes, ma'am. It's right there. Yeah, we</p> <p>2 knew Tramadol.</p> <p>3 A. You know what, I just be taking the</p> <p>4 medicine. It's sad, but I just take the medicine.</p> <p>5 They prescribe it. If I don't keep a list, I</p> <p>6 don't be knowing. I just be trying to feel</p> <p>7 better.</p> <p>8 Q. And in terms of the anxiety and</p> <p>9 depression from being let go back in December of</p> <p>10 '23, has it improved from then until now?</p> <p>11 A. Yeah, because I can't -- kind of sort</p> <p>12 of. But it's better. It's a whole lot better</p> <p>13 because -- it's a whole lot, lot better. Because</p> <p>14 when you got the -- your bills piling up and</p> <p>15 then -- you know, it gets stressful because of</p> <p>16 that. And then on top of that, like I said, it</p> <p>17 was after the holidays, you know, when everybody</p> <p>18 just -- and when you didn't know that -- if it was</p> <p>19 something that you knew was fixing to happen, then</p> <p>20 you probably could -- you prepare.</p> <p>21 But with this job, anyway if I -- I</p> <p>22 couldn't just make it off of the prion, just like</p> <p>23 I couldn't make it off of the school. So I have</p> <p>24 to have two incomes. So I just pray and keep</p> <p>25 moving. That's what I have to do.</p>
Page 31	Page 33
<p>1 A. Okay. When this was?</p> <p>2 Q. March 4th of '25, it looks like.</p> <p>3 A. March the 4th. I'm trying to see.</p> <p>4 That's probably because I did -- I just had my</p> <p>5 battery replaced.</p> <p>6 Q. There you go. Right. And that was</p> <p>7 causing --</p> <p>8 A. Yeah.</p> <p>9 Q. That means you've got to go back in.</p> <p>10 A. Yeah, because when I went to my doctor,</p> <p>11 they didn't give -- when I left the hospital, they</p> <p>12 didn't give me anything for pain. So that's with</p> <p>13 Dr. Bounds, right?</p> <p>14 Q. Yes, ma'am.</p> <p>15 A. Yeah, and he told me that -- with my</p> <p>16 condition, they should have at least gave me</p> <p>17 something. Not to last a whole -- you know. But</p> <p>18 he gave me a couple of pills to help with the pain</p> <p>19 from that.</p> <p>20 Q. Like tramadol?</p> <p>21 A. I can't --</p> <p>22 Q. Yeah, that's a good pain medi --</p> <p>23 A. I don't be knowing the name of the</p> <p>24 medicine. I think it might have been that. It's</p> <p>25 probably on there. But he gave me the --</p>	<p>1 Q. I understand. Absolutely. I think</p> <p>2 that's all I've got, and we'll mark this as six.</p> <p>3 MR. CARPENTER: Carroll?</p> <p>4 EXAMINATION BY MR. RHODES:</p> <p>5 Q. Just a couple.</p> <p>6 Ms. Sanders already established that you</p> <p>7 were having depression issues prior to getting</p> <p>8 that termination letter in December 2023?</p> <p>9 A. Yes, sir.</p> <p>10 Q. After you received that termination</p> <p>11 letter on December 31st, 2023, did your depression</p> <p>12 get better, worse or stay the same?</p> <p>13 A. It got worse.</p> <p>14 Q. Okay.</p> <p>15 A. It got worse. Because, like I said, it</p> <p>16 was -- that was just like a ball getting -- a</p> <p>17 baseball hitting me in my nose or face or</p> <p>18 something.</p> <p>19 Q. Could you tell us how it got worse?</p> <p>20 A. Because here -- like I said, you got to</p> <p>21 look at it. This was December the 31st. This is</p> <p>22 after Christmas holidays. And then you get your</p> <p>23 last pay and you got bills to -- you know what I'm</p> <p>24 saying? You got bills that you got -- the bills</p> <p>25 constantly rolling but you don't have no income</p>

9 (Pages 30 to 33)

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1 coming in. So that's enough to stress you out,  
2 because it's only me. I don't have a husband. I  
3 don't have a boyfriend. I don't have anybody to  
4 help me. So that's stressing me because how I'm  
5 going to pay my water bill, how I'm going to pay,  
6 you know, my light, gas, all of this here. How am  
7 I going to pay these bills when I no longer have  
8 income?

9 Q. I know you say it stressed you out. I  
10 want to ask: How did it stress you -- how --

11 A. Oh, with the not sleeping and not eating  
12 and stuff like that. I mean, I don't eat that  
13 much now but I could go two days or whatever  
14 without eating and, you know, realizing that I  
15 hadn't ate. But I would, you know, drink  
16 something or whatever. It was just terrible. And  
17 I know that I needed to eat. I knew I needed to  
18 sleep. But even the medicine seemed, at one time,  
19 didn't work. And I know that I couldn't keep  
20 going to the doctor because I really couldn't  
21 afford it.

22 Q. Now, before you got the termination  
23 letter in December, were you taking medication?

24 A. Yes, sir.

25 Q. And about how many hours a night were

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1 increased your medications, right?

2 A. The migraine.

3 Q. For migraine?

4 A. Uh-huh. (Affirmative response.)

5 Q. Is that a --

6 A. Yes, sir.

7 Q. Did they increase any of the medicine  
8 you were taking for depression?

9 A. I can't remember. Like I say, I just  
10 tell them stuff and I let them write the  
11 prescription and go on. But I do know the reason  
12 why -- and I don't even know if he changed it on  
13 the prescription, but I do know that I supposed to  
14 have been taking -- it was called Topamax. And  
15 the Topamax is for my migraine. And I was taking  
16 it like one a day -- one in the daytime and one at  
17 night. And he switched it to four -- he told me  
18 to take four at night. Instead of taking one in  
19 the day, one at night, he told me to take four  
20 every night.

21 Q. Now, before December 31st, before you  
22 received your termination letter, how often did  
23 you have those migraine headaches?

24 A. I really didn't have them that often. I  
25 didn't even have them that often, unless it was

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1 you able to sleep while you were working the two  
2 jobs and you're taking the medication prior to  
3 getting the termination letter?

4 A. When I was working I could get a good  
5 six, seven. But after that happened, it seemed  
6 like I wasn't even taking no medicine and I'd be  
7 back up in about three hours. Two, three hours.

8 Q. So you went to sleeping six to seven  
9 hours to after you got your termination letter you  
10 were only able to sleep about three?

11 A. Because I was tossing and turning.

12 Q. Okay. And how long -- after  
13 December 31st, 2023, how long did that last where  
14 you were only able to sleep about --

15 A. Three, four months.

16 Q. That lasted about three or four months?

17 A. Yeah. When I found out that it was  
18 going -- my -- about three, four, maybe five  
19 months. After I discovered that when my age -- I  
20 was going to be able to get another income. Like  
21 the Social Security I told you that somebody was  
22 talking to me about, then it got kind of like -- I  
23 felt a relief that maybe, you know, I'm fixing to  
24 get another income, so this will help me.

25 Q. And you testified that the doctor

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1 stress.

2 Q. Were you on medicines for migraine prior  
3 to getting that termination letter?

4 A. Yeah, because the way that the  
5 medicine -- they tell you to take it every day so  
6 that -- because when you get migraines, it's  
7 really excruciating pain. So the way I was taking  
8 it, I was taking it every day anyway to prevent --  
9 you know what I'm saying, prevent from having  
10 them.

11 Q. Did the frequency of your migraines  
12 increase, decrease or stay the same after you got  
13 that termination letter?

14 A. It increased. That's when he doubled  
15 the doses. Increased to four. That's when I had  
16 to take four.

17 Q. And then about how often would you have  
18 those migraine headaches after you got your  
19 termination letter?

20 A. Pretty much weekly. Pretty much three  
21 to four -- pretty much mostly every day for a  
22 while. That's why I had went to him, because it  
23 was like an every day thing. And he was saying  
24 that it was the migraine. But he increased them  
25 and it was like -- I would get at least two or

10 (Pages 34 to 37)

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<p>1 three a week.</p> <p>2 Q. And how long were those -- each episode</p> <p>3 of a migraine last -- after you got that</p> <p>4 termination letter, how long would it happen?</p> <p>5 A. It lasted about -- it lasted some</p> <p>6 months.</p> <p>7 Q. No, I mean at a time when you got a</p> <p>8 migraine.</p> <p>9 A. Oh, the migraines would last like weeks</p> <p>10 at a time even with taking -- after me going to</p> <p>11 him, it would last for weeks at a time because --</p> <p>12 you know, I would say that I was going to -- I</p> <p>13 didn't want -- I was going to ask him to give me</p> <p>14 something else but I never -- I be forgetting to</p> <p>15 tell him, you know, because sometimes -- if it</p> <p>16 ease up by the time it's time for me to go to the</p> <p>17 doctor, I forget to ask him about changing it</p> <p>18 until it would act up again. But now since</p> <p>19 everything is more smoothly, you know, it's not as</p> <p>20 bad. I'm not having them like I used to.</p> <p>21 Q. I was about to ask had the migraines</p> <p>22 eased up?</p> <p>23 A. Yeah.</p> <p>24 Q. And when did they start to ease up?</p> <p>25 A. Probably after I found out I was going</p>	<p>1 A. It's gotten better.</p> <p>2 Q. And about when did it start to get</p> <p>3 better?</p> <p>4 A. Probably last -- you know, last year,</p> <p>5 probably.</p> <p>6 Q. Okay. That's all I have.</p> <p>7 EXAMINATION BY MR. CARPENTER:</p> <p>8 Q. You were talking to Mr. Rhodes about</p> <p>9 your appetite changing. Did it affect your weight</p> <p>10 dramatically?</p> <p>11 A. Not that I know of.</p> <p>12 Q. Okay. All right. And looking at the</p> <p>13 records on Page 37, on December of 2023 it says</p> <p>14 we're going to refill topiramate tablet. And I</p> <p>15 think you described that as your migraine</p> <p>16 medicine?</p> <p>17 A. Uh-huh. (Affirmative response.) And</p> <p>18 they call it Topamax, the name brand.</p> <p>19 Q. And it was orally, twice daily?</p> <p>20 A. Yes.</p> <p>21 Q. Okay.</p> <p>22 A. But now -- see, that's what I'm saying.</p> <p>23 That's what they got it now. But he never did go</p> <p>24 back and change it because I'm taking them four</p> <p>25 times.</p>
Page 39	Page 41
<p>1 to be okay.</p> <p>2 Q. Could you give us a month?</p> <p>3 A. Maybe four -- four months, at the most</p> <p>4 five.</p> <p>5 Q. Four or five months ago?</p> <p>6 A. Probably.</p> <p>7 Q. Okay. And you also mentioned that your</p> <p>8 appetite changed. How was your appetite before</p> <p>9 you received that termination letter?</p> <p>10 A. I would eat a lot. Well, I don't eat</p> <p>11 that much, but, you know, my appetite was on the</p> <p>12 regular. After that I could miss days without</p> <p>13 eating and just drink something and keep going.</p> <p>14 Q. How many meals would you eat a day prior</p> <p>15 to getting your termination letter?</p> <p>16 A. Well, I don't know. I never did -- you</p> <p>17 know, like talking about like three meals a day</p> <p>18 and stuff like that?</p> <p>19 Q. Did you eat twice a day, three times a</p> <p>20 day?</p> <p>21 A. Prior to that, when I used to work</p> <p>22 there, I used to eat all the day. And after that,</p> <p>23 maybe once or not at all.</p> <p>24 Q. Okay. And has your appetite gotten any</p> <p>25 better or worse?</p>	<p>1 Q. Okay.</p> <p>2 A. I'm going to have to tell him about that</p> <p>3 when I go back.</p> <p>4 Q. Yes, ma'am. Now, I was going to see --</p> <p>5 because he has on your records for March the 4th</p> <p>6 of 2025 -- and I'll show you right here -- it's</p> <p>7 topiramate.</p> <p>8 A. What is that?</p> <p>9 Q. There's a lot of medicines, of course.</p> <p>10 A. Oh, yeah, yeah.</p> <p>11 Q. So it's down here, topiramate. Two</p> <p>12 tablets orally, twice daily.</p> <p>13 A. Uh-huh. (Affirmative response.)</p> <p>14 Q. Okay. And that's -- and so the medicine</p> <p>15 that you were taking for topiramate in March of</p> <p>16 '25 is the same dosage and the same frequency as</p> <p>17 that of December 2023, at least according to the</p> <p>18 records?</p> <p>19 A. Uh-huh. (Affirmative response.)</p> <p>20 Q. You have to yes or no?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. That's all I've got.</p> <p>23 BY MR. RHODES:</p> <p>24 Q. Let me just ask you about that medicine</p> <p>25 that's according to the record. Are you taking --</p>

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1 how many --  
 2 A. I'm taking four.  
 3 Q. Okay. When did you start taking the  
 4 four tablets a day?  
 5 A. I've got to go back to him because -- he  
 6 should have it in there, because he the one told  
 7 me that -- because I was telling him to the change  
 8 the medicine because it wasn't helping me. And he  
 9 the one told me -- so evidently he put it in his  
 10 records. Like I say, I still take four at night.  
 11 Q. Where do you get your medicines filled?  
 12 A. Wal-Mart.  
 13 Q. And --  
 14 A. So I'm going to ask him.  
 15 Q. Did you have a prescription to take into  
 16 Wal-Mart --  
 17 A. No, he call everything in. So I don't  
 18 pay any attention to -- like I say. But when I go  
 19 back, I'm going to ask him, though.  
 20 Q. On your bottle --  
 21 A. Oh, I don't watch that.  
 22 Q. -- does it say --  
 23 A. I'm going to have to see. I don't know.  
 24 Let me see if I have a copy. Because normally I  
 25 have a copy of my medication. And then he might

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1 CERTIFICATE OF DEPONENT  
 2 DEPONENT: SANDRA SANDERS  
 3 DATE: April 18, 2025  
 4 CASE STYLE: SMITH, ET AL vs. JEFFERSON COUNTY,  
 5 MISSISSIPPI, ET AL  
 6 ORIGINAL TO: THOMAS L. CARPENTER, ESQ.  
 7 I, the above-named deponent in the  
 8 deposition taken in the herein styled and numbered  
 9 cause, certify that I have examined the deposition  
 10 taken on the date above as to the correctness  
 11 thereof, and that after reading said pages, I find  
 12 them to contain a full and true transcript of the  
 13 testimony as given by me.  
 14 Subject to those corrections listed below,  
 15 if any, I find the transcript to be the correct  
 16 testimony I gave at the aforesaid time and place.  
 17 Page Line Comments  
 18 \_\_\_\_\_  
 19 \_\_\_\_\_  
 20 \_\_\_\_\_  
 21 \_\_\_\_\_  
 22 \_\_\_\_\_  
 23 \_\_\_\_\_  
 24 \_\_\_\_\_  
 25 \_\_\_\_\_  
 This the \_\_\_\_\_ day of \_\_\_\_\_, 2025.  
 \_\_\_\_\_  
 SANDRA SANDERS  
 State of Mississippi  
 County of \_\_\_\_\_  
 Subscribed and sworn to before me, this the  
 \_\_\_\_\_ day of \_\_\_\_\_, 2025.  
 My Commission Expires: \_\_\_\_\_  
 \_\_\_\_\_  
 Notary Public

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1 not even -- I don't know. But I know I was taking  
 2 four. Then it might be old. See, this one here  
 3 old because this one got take one by mouth two --  
 4 take one by oral two times every day. That's what  
 5 it's got on it.  
 6 MR. CARPENTER: Okay. So this is from  
 7 March of '24. So this would have been a year ago.  
 8 And it shows -- yeah, topiramate one tablet two  
 9 times every day.  
 10 THE WITNESS: Uh-huh. (Affirmative  
 11 response.) But I'm taking four.  
 12 MR. CARPENTER: Gotcha. All right.  
 13 Fair enough. Yes, ma'am.  
 14 THE WITNESS: But I've got to sure ask  
 15 him, though. But I don't take my medicine -- I'm  
 16 supposed to take them every day, but when you got  
 17 to pay for it it's kind of like hard.  
 18 MR. CARPENTER: Right. I understand.  
 19 We sure appreciate it.  
 20 (Time Noted: 1:58 p.m.)  
 21 SIGNATURE/NOT WAIVED  
 22  
 23 ORIGINAL: MR. CARPENTER, ESQ.  
 24 COPY: MR. RHODES, ESQ.  
 25

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1 CERTIFICATE OF COURT REPORTER  
 2 I, Robin G. Burwell, Court Reporter and  
 3 Notary Public, in and for the State of Mississippi,  
 4 hereby certify that the foregoing contains a true  
 5 and correct transcript of the testimony of SANDRA  
 6 SANDERS, as taken by me in the aforementioned matter  
 7 at the time and place heretofore stated, as taken by  
 8 stenotype and later reduced to typewritten form  
 9 under my supervision by means of computer-aided  
 10 transcription.  
 11 I further certify that under the authority  
 12 vested in me by the State of Mississippi that the  
 13 witness was placed under oath by me to truthfully  
 14 answer all questions in the matter.  
 15 I further certify that, to the best of my  
 16 knowledge, I am not in the employ of or related to  
 17 any party in this matter and have no interest,  
 18 monetary or otherwise, in the final outcome of this  
 19 matter.  
 20 Witness my signature and seal this the  
 21 30th day of April, 2025.  
 22 \_\_\_\_\_  
 23 ROBIN G. BURWELL, #1651  
 24 CRR, RPR, CCR  
 25 My Commission Expires:  
 April 6, 2029

12 (Pages 42 to 45)